

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

AUGUST WILDMAN, *et al.*,

Plaintiffs,

v.

DEUTSCHE BANK AKTIENGESELLSCHAFT,
DEUTSCHE BANK UK, DEUTSCHE BANK AG,
DUBAI BRANCH, DEUTSCHE BANK AG, NEW
YORK BRANCH, DEUTSCHE BANK TRUST
COMPANY AMERICAS, STANDARD
CHARTERED BANK, STANDARD CHARTERED
PLC, STANDARD CHARTERED BANK LIMITED,
STANDARD CHARTERED BANK (PAKISTAN)
LIMITED, STANDARD CHARTERED BANK,
DUBAI MAIN BRANCH, DANSKE BANK A/S,
DANSKE MARKETS INC., PLACID NK
CORPORATION d/b/a PLACID EXPRESS, and
WALL STREET EXCHANGE LLC,

Defendants.

1:21-cv-04400 (KAM) (RML)

**STIPULATION AND NOTICE OF VOLUNTARY
DISMISSAL WITHOUT PREJUDICE AS TO CERTAIN OF
THE NAMED DEFENDANTS**

WHEREAS Plaintiffs' Complaint names as defendants, *inter alia*, "Deutsche Bank AG",
"Deutsche Bank UK", "Deutsche Bank AG, Dubai Branch", and "Deutsche Bank AG, New
York Branch"; and

WHEREAS, counsel for Deutsche Bank AG has confirmed to counsel for Plaintiffs that
there is no entity "Deutsche Bank UK", although there is a "Deutsche Bank AG, London Branch",
and so stipulates; and

WHEREAS, counsel for Deutsche Bank has confirmed to counsel for Plaintiffs that branches of Deutsche Bank AG are not separate and distinct legal entities from Deutsche Bank AG, and so stipulates; and

WHEREAS, Plaintiffs' Complaint names as defendants, *inter alia*, "Standard Chartered Bank Limited" and "Standard Chartered Bank, Dubai Main Branch"; and

WHEREAS, counsel for Standard Chartered Bank has confirmed to counsel for Plaintiffs that "Standard Chartered Bank Limited" is not an entity within the Standard Chartered group of companies, and so stipulates; and

WHEREAS, counsel for Standard Chartered Bank has confirmed to counsel for Plaintiffs that there is no entity "Standard Chartered Bank, Dubai Main Branch" but rather the Standard Chartered entity that operates in Dubai is Standard Chartered Bank, and so stipulates; and

WHEREAS, Plaintiffs and the defendants who are parties to this Stipulation and Notice ("Stipulating Defendants") agree that no defenses of the Stipulating Defendants to the claims in this action, including but not limited to defenses based upon lack of personal or subject matter jurisdiction, lack of standing, improper venue or a defendant having been improperly named, is prejudiced or waived by the execution of, agreement to, or filing of this stipulation, and so stipulate.

WHEREFORE, PLEASE TAKE NOTICE that pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, Plaintiffs hereby voluntarily dismiss all claims in this action, without prejudice, as to Defendants Deutsche Bank UK; Deutsche Bank AG, Dubai Branch; Deutsche Bank AG, New York Branch; Standard Chartered Bank Limited; and Standard Chartered Bank, Dubai Main Branch.

No Defendant has served an answer or motion for summary judgment in this action. Accordingly, Plaintiffs' dismissal of the action as to these Defendants is effective upon filing of this notice.

Dated: October 4, 2021

/s/_____
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Stipulated and Agreed

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*Counsel for Defendants Standard Chartered Bank,
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(Pakistan) Limited*

CERTIFICATE OF SERVICE

I, Eli J. Kay-Oliphant, hereby certify that on October 4, 2021, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF System, which will send notification of such public filing to all counsel registered to receive such notice.

/s/ Eli J. Kay-Oliphant